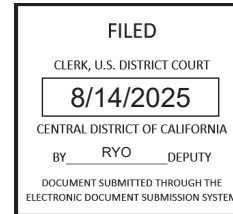


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IN PRO PER
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff and Counterclaim

Defendant

vs.

ASHLEY RICHARDSON,

Defendant and Counterclaim

Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF ASHLEY RICHARDSON
IN RESPONSE TO PLAINTIFF'S OPPOSITION
TO DEFENDANT ASHLEY RICHARDSON'S
MOTION TO COMPEL AND REQUEST FOR
SANCTIONS

DECLARATION OF ASHLEY RICHARDSON

I, Ashley Richardson, declare as follows:

I. Pro Se Status and Good Faith Efforts

I am the Defendant and Counterclaimant in this matter, representing myself without legal counsel. Despite lacking formal legal training and the resources available to Plaintiff's counsel, I have acted in good faith to comply with all discovery obligations.

DECLARATION OF ASHLEY RICHARDSON IN RESPONSE TO PLAINTIFF'S OPPOSITION TO
DEFENDANT ASHLEY RICHARDSON'S MOTION TO COMPEL AND REQUEST FOR SANCTIONS - 1

1 To date, I have produced over 40 pages of interrogatory responses and more than 1,000
2 pages of documents, in addition to making repeated attempts to schedule and participate in
3 depositions. While I have met Court deadlines and responded in good faith, Plaintiff's counsel
4 has consistently refused to make their client available for deposition for nearly a year,
5 conditioning such availability on my complete compliance with all of their demands —
6 regardless of scope or propriety.

7 **II. Procedural Harassment and Withholding of Discovery**

8 Plaintiff's counsel's refusal to schedule Plaintiff's deposition unless I first produce every
9 item they request is contrary to the cooperative intent of the Federal Rules of Civil Procedure and
10 has no basis in law.

11
12 For example, Plaintiff's counsel noticed my deposition in September 2024, which I was
13 fully prepared to attend, then cancelled it at the last minute. Their current claim that they cannot
14 proceed without certain discovery is inconsistent with their prior actions and appears calculated
15 to delay, obstruct, and create procedural disadvantage.

16 **III. Failure to Serve Filings Properly**

17 Plaintiff's counsel has repeatedly failed to serve me with proper notice of their filings.
18 Notably, on October 30, 2024, they filed a temporary restraining order in federal court without
19 serving me.

20
21 This improper filing included private text messages obtained through discovery, which I
22 did not learn of until after the matter was dismissed. The lack of service deprived me of my right
23 to respond, prejudiced my ability to defend myself, and resulted in damaging materials being
24 filed publicly without my knowledge or opportunity to contest them.

25 **IV. Use of Prior Mental Health Crisis for Litigation Advantage**

1 In October 2024, Plaintiff filed a number of text messages that I sent to Plaintiff during a
2 mental health crisis and alcohol relapse. These texts expressed profound anguish and reflected
3 the severe emotional harm I was experiencing as a result of Plaintiff's actions.

4
5 While the text messages contained no threats to Plaintiff or her daughter, Plaintiff filed
6 them publicly in both Monterey County Superior Court and this Court in connection with the
7 now-dismissed temporary restraining order. Both jurisdictions dismissed the matter.

8 The filing of these deeply personal communications, and false accusation that I was a
9 physical threat to Plaintiff's safety — in two separate jurisdictions — caused severe and lasting
10 harm to my mental health and reputation. The subsequent republication of these materials
11 through the press, and the resulting press interest that has followed, has compounded that harm.

12 13 **V. Misuse of Private Communications and Media Leaks**

14 In late July, a reporter asked if I would like to comment on a text message between
15 myself and the CEO of Persistence that was likely to be included in a magazine article. In the
16 article, the reporter said, a spokesman for Thomson had pointed to the text, which related to a
17 finder's fee being omitted from an investment contract. I believe Plaintiff presented it in a
18 manner designed to imply wrongful or fraudulent conduct, it in fact affirms what I have
19 consistently stated: that there was an agreed-upon finder's fee, to be realized solely at Plaintiff's
20 discretion, and therefore it was not included in the written contract.

21 That text message was not public and was likely improperly obtained from discovery in
22 the Singapore Arbitration. The apparent disclosure of that text — which was filed on the public
23 docket about three weeks later — strongly suggests that Plaintiff's counsel misused discovery
24 materials to serve an extra-judicial agenda, in violation of the intended purpose of the discovery
25 process and to my prejudice. This sequence of events points to a misuse of court filings to
26 advance a media strategy rather than for a legitimate litigation purpose.

27 **VI. False and Hostile Statements from Counsel**

28 DECLARATION OF ASHLEY RICHARDSON IN RESPONSE TO PLAINTIFF'S OPPOSITION TO
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On or about August 3, 2025, Plaintiff's counsel sent me an email (attached as Exhibit D) falsely accusing me of threatening to make "false and defamatory statements to the press" unless Plaintiff paid me millions of dollars. This accusation is not only baseless — it is harassing and improper.

I did not seek out press attention; it began only after Plaintiff chose to file a baseless temporary restraining order ("TRO") in Monterey County Superior Court, which included deeply personal text messages taken out of context. That TRO was later dismissed in both state and federal court, yet it placed this dispute into the public record that received press coverage and subsequent media interest. Plaintiff and her representatives have since continued to disseminate damaging and false narratives — including portraying me as a physical threat — leaving me with no choice but to respond publicly.

Any statements I have made to the media have been for the purpose of defending myself against reputational harm caused by Plaintiff's own public actions. These communications have no connection to any alleged "extortion" and have no bearing on the merits of my counterclaim. To accuse me of weaponizing the press is to invert the truth: it was Plaintiff's public filings and statements that created the media attention, and I have acted only in lawful self-defense of my reputation.

VII. Harassment of Family Members by Plaintiff's Agents

On August 5, 2025 — just three days after receiving the threatening email from Plaintiff's counsel referenced above — Plaintiff dispatched a private investigator from Guidepost Solutions to the private residences of my elderly mother and my sister. The investigator questioned and insinuated false accusations to my family members, that included among other things, that I may have profited improperly from Plaintiff and that I fabricated my entire professional career.

1 This uninvited intrusion caused tremendous distress to my family. My mother, collapsed
2 from the stress of the encounter and required medical attention. I find it difficult to identify any
3 legitimate purpose for such an action. At a minimum, it was highly unprofessional, and in my
4 view, it constitutes harassment intended to intimidate both myself and those close to me.

5
6 **VIII. Financial Hardship**

7 As a direct result of Plaintiff's actions, I am experiencing severe financial hardship and
8 cannot currently afford basic necessities, including food or housing. Any monetary sanction
9 would effectively punish me for my inability to retain counsel and defend myself, which would
10 be contrary to the principle of access to justice and inequitable given the demonstrated bad faith
11 of Plaintiff's counsel.

12 **VIII. Personal and Professional Impact**

13 Prior to the events giving rise to this litigation, I was a successful, vibrant, and fully
14 engaged member of my community, both personally and professionally. My work, relationships,
15 and overall well-being reflected a life built through years of dedication and effort.

16 Since the actions of Plaintiff and her counsel began, my circumstances have changed
17 drastically. I am now facing near-destitution, navigating complex litigation without counsel, and
18 defending myself against a barrage of procedural maneuvers that would challenge even seasoned
19 attorneys. The cumulative effect of these tactics has been personally and professionally
20 devastating and reflects a clear imbalance of resources. Plaintiff's substantial wealth and legal
21 firepower have been used in a manner that places an extraordinary and disproportionate burden
22 on me as a self-represented litigant, yet I have continued to make every good faith effort to
23 comply with this Court's rules and orders.

24 I declare under penalty of perjury under the laws of the United States of America
25 that the foregoing is true and correct.

26
27 Executed on this 14th day of August, 2025, in Monterey California.

28 DECLARATION OF ASHLEY RICHARDSON IN RESPONSE TO PLAINTIFF'S OPPOSITION TO
DEFENDANT ASHLEY RICHARDSON'S MOTION TO COMPEL AND REQUEST FOR SANCTIONS - 5

Respectfully submitted,

Ashley Richardson

Dated August 14, 2025.

A handwritten signature in black ink, appearing to be 'AR' followed by a long horizontal stroke.

Ashley Richardson

In Pro Per